Exhibit A MAP OF PROPOSED SERVICE AREA

EXHIBIT B

NON-RURAL EXCHANGES FOR IMMEDIATE DESIGNATION

Service Area	Wire Center Name	Wire Center Code	
Verizon New England, Inc.	Acton	MTMLNHWE	
Verizon New England, Inc.	Alstead	ALSTNHLI	
Verizon New England, Inc.	Ashland	ASLDNHHI	
Verizon New England, Inc.	Barrington (partial)	BNTONHPR	
Verizon New England, Inc.	Bartlett	BRTLNHGE	
Verizon New England, Inc.	Bedford	BDFRNHAM	
Verizon New England, Inc.	Belmont	BLMTNHMA	
Verizon New England, Inc.	Berlin	BRLNNHHE	
Verizon New England, Inc.	Bethlehem	BHLHNHCR	
Verizon New England, Inc.	Berwick (partial)	SMRSNHHI	
Verizon New England, Inc.	Bristol	BRSTNHSP	
Verizon New England, Inc.	Campton	CMTNNHOW	
Verizon New England, Inc.	Campton	WVVYNHMR	
Verizon New England, Inc.	Canaan	CANNNHYA	
Verizon New England, Inc.	Canaan	WSTWNHBS	
Verizon New England, Inc.	Candia (partial)	CANDNHDE	
Verizon New England, Inc.	Canterbury	CNTRNHSH	
Verizon New England, Inc.	Center Harbor	CNHRNHPL	
Verizon New England, Inc.	Charleston	CHTWNHBR	
Verizon New England, Inc.	Claremont (partial)	CLMTNHBR	
Verizon New England, Inc.	Concord	CNCRNHSO	
Verizon New England, Inc.	Conway	CNWYNHYA	
Verizon New England, Inc.	Ctrossipee	CNOSNHFO	

Verizon New England, Inc.	Ctrsandwih	MLBONHYA	
Verizon New England, Inc.	Ctrsandwih	CNSWNHSL	
Verizon New England, Inc.	Danbury	DNBRNHDB	
Verizon New England, Inc.	Dover/Eliot	DOVRNHTH	
Verizon New England, Inc.	Dublin	DBLNNHMO	
Verizon New England, Inc.	Durham	DRHMNHMC	
Verizon New England, Inc.	Enfield	ENFDNHNM	
Verizon New England, Inc.	Epping (partial)	EPNGNHMA	
Verizon New England, Inc.	Epsom	EPSMNHBH	
Verizon New England, Inc.	Farmington	FRTNNHMG	
Verizon New England, Inc.	Fitzwilliam	FTZWNHUT	
Verizon New England, Inc.	Franconia	FRNCNHWH	
Verizon New England, Inc.	Franklin	FKLNNHFR	
Verizon New England, Inc.	Glendale	GLDLNHAB	
Verizon New England, Inc.	Goffstown	GFTWNHWH	
Verizon New England, Inc.	Gorham (partial)	GRHMNHLA	
Verizon New England, Inc.	Greenfield	GNFDNHMA	
Verizon New England, Inc.	Greenville	GNVLNHAD	
Verizon New England, Inc.	Groveton (partial)	GVTNNHST	
Verizon New England, Inc.	Hancock	HNCCNHSC	
Verizon New England, Inc.	Hanover (partial)	HNVRNHSC	
Verizon New England, Inc.	Harrisville	HRVLNHMA	
Verizon New England, Inc.	Hinsdale	HNDLNHMA	
Verizon New England, Inc.	Jackson	JCSNNHTH	
Verizon New England, Inc.	Jaffrey	JFRYNHRI	
Verizon New England, Inc.	Jefferson	JFSNNHYA	

Verizon New England, Inc.	Keene	KEENNHWA	
Verizon New England, Inc.	Kittery (partial) PTMONHIS		
Verizon New England, Inc.	Laconia	LACNNHNM	
Verizon New England, Inc.	Laconia	WERSNHST	
Verizon New England, Inc.	Lancaster	LNCSNHHI	
Verizon New England, Inc.	Lebanon	LBNNNHBA	
Verizon New England, Inc.	Lemington	CLBKNHMA	
Verizon New England, Inc.	Lisbon	LSBNNHMA	
Verizon New England, Inc.	Littleton	LTTNNHPL	
Verizon New England, Inc.	Lyme (partial)	LYMENHYA	
Verizon New England, Inc.	Madison	MDSNNHYA	
Verizon New England, Inc.	Manchester (partial)	MNCHNHCO	
Verizon New England, Inc.	Marlborough	MRBONHYA	
Verizon New England, Inc.	Marlow	MRLWNHYA	
Verizon New England, Inc.	Meredith	MRDTNHWA	
Verizon New England, Inc.	Merrimack	MRMCNHYA	
Verizon New England, Inc.	Milan (partial)	MILNNHPL	
Verizon New England, Inc.	Milford	MLFRNHSO	
Verizon New England, Inc.	Milton Mall	MTMLNHWE	
Verizon New England, Inc.	Monroe (partial)	BARNVTCH	
Verizon New England, Inc.	Nashua	NASHNHGR	
Verizon New England, Inc.	Nashua	NASHNHWP	
Verizon New England, Inc.	New Boston	NBTNNHHP	
Verizon New England, Inc.	New Market (partial)	NWMRNHGE	
Verizon New England, Inc.	Newport	NWPTNHMA	
Verizon New England, Inc	North Conway	NCWYNHKE	

Verizon New England, Inc.	North Haverhill	NHHLNHDL
Verizon New England, Inc.	North Lebanon (partial)	
Verizon New England, Inc.	North Stratford (partial) NSFRNHMA	
Verizon New England, Inc.	North Walpole (partial)	BLFLVTHE
Verizon New England, Inc.	North Woodstock	NWDSNHMA
Verizon New England, Inc.	Orford (partial)	FARLVTML
Verizon New England, Inc.	Pelham	PLHMNHBR
Verizon New England, Inc.	Penacook	PNCKNHCH
Verizon New England, Inc.	Peterborough	PTRBNHCO
Verizon New England, Inc.	Piermont (partial)	BRFRVTPG
Verizon New England, Inc.	Pike	PIKENHPI
Verizon New England, Inc.	Pittsburg (partial)	PSBGNHMA
Verizon New England, Inc.	Pittsfield	PTFDNHBR
Verizon New England, Inc.	Plainfield (partial)	PLFDVTYA
Verizon New England, Inc.	Plymouth	PLMONHLH
Verizon New England, Inc.	Rindge	RNDGNHCE
Verizon New England, Inc.	Rochester/So. Lebanon (partial)	ROCHNHWE
Verizon New England, Inc.	Rumney	RMNYNHSL
Verizon New England, Inc.	Sanbornville	SBVLNHCS
Verizon New England, Inc.	Spofford	SPFRNHMS
Verizon New England, Inc.	Sullivan	SLLVNHYA
Verizon New England, Inc.	Sunapee	SUNPNHMC
Verizon New England, Inc.	Suncook	SNCKNHPA
Verizon New England, Inc.	Tamworth	TMWONHWH
Verizon New England, Inc.	Tilton	TLTNNHPR
Verizon New England, Inc.	Troy	TROYNHPR

Verizon New England, Inc.	Twin Mount	TWMTNHYA
Verizon New England, Inc.	Walpole (partial)	WLPLNHWP
Verizon New England, Inc.	Warren	WRRNNHMA
Verizon New England, Inc.	Wstewatstn	WSTWNHBS
Verizon New England, Inc.	Weathersfield	WNDSVTPI
Verizon New England, Inc.	Weirs	WERSNHST
Verizon New England, Inc.	Wellsriver	WDVLNHJL
Verizon New England, Inc.	Westmoreland	WMLDNHWE
Verizon New England, Inc.	West Chesterfield (partial)	BRBOVTMA
Verizon New England, Inc.	West Lebanon (partial)	MLTNNHSI
Verizon New England, Inc.	White River Junction	WRJTVTGA
Verizon New England, Inc.	Whitefield	WHFDNHPL
Verizon New England, Inc.	Winchester	WNCHNHMI
Verizon New England, Inc.	Wilson's Mill (partial)	ERRLNHYA
Verizon New England, Inc.	Wolfeboro	WLBONHGS
Verizon New England, Inc.	Woodsville (partial)	NHHLNHDM

EXHIBIT C

SERVICE AREAS RCC MINNESOTA, INC. COVERS COMPLETELY FOR IMMEDIATE ETC DESIGNATION

Bretton Wood Telephone Company
Wire Center(s): Bretton Woods
Dixville Telephone Company
Wire Center(s): Dixville Ntch
Dunbarton Telephone Company
Wire Center(s): Dunbarton
Hollis Telephone Company
Wire Center(s): Hollis
Kearsarge Telephone Company
Wire Center(s): Andover Boscawen Chichester Meriden New London Salisbury
Merrimack County Telephone Company d/b/a Contoocook Valley
Wire Center(s):

Antrim Henniker Hillsboro Melvin Village

Merrimack County Telephone Company

Wire Center(s):

Bradford

Contoocook

Sutton

Warner

Union Telephone Company - New Hampshire

Wire Center(s):

Alton

Barnestead

Center Barnstead

Glntnirwrs

New Durham

Wilton Telephone Company

Wire Center(s):

Wilton

EXHIBIT D

RURAL SERVICE AREAS REQUIRING RECLASSIFICATION ALONG WIRE CENTER BOUNDARIES

Service Area	Wire Center Name	Wire Center Code	Served Y/N	Partial/ Entire
Granite State Telephone, Inc.	Hillsburg Village	HUVGNHXA	Y	Entire
Granite State Telephone, Inc.	Chester	CHESNHXA	N	
Granite State Telephone, Inc.	Weare	WEARNHXA	Y	Entire
Granite State Telephone, Inc.	Washington	WASHNHXA	Y	Entire
Northland Telephone of Maine, Inc.	Fryeburg	FRBGMEXA	Y	Partial
Northland Telephone of Maine, Inc.	North Fryeburg	NFBGMEXA	Y	Partial
Northland Telephone of Maine, Inc.	Brooks	BRKSMEXA	N	
Northland Telephone of Maine, Inc.	Eagle Lake	EGLKMEXA	N	
Northland Telephone of Maine, Inc.	Freedom	FRDMMEXA	N	
Northland Telephone of Maine, Inc.	Fort Kent	FTKNMEXA	N	
Northland Telephone of Maine, Inc.	Island Falls	ISFLMEXA	N	
Northland Telephone of Maine, Inc.	Kingman	KGMNMEXA	N	
Northland Telephone of Maine, Inc.	Morrill	LBRTMEXA	N	
Northland Telephone of Maine, Inc.	Lee	LEE MEXA	N	

Northland Telephone of Maine, Inc.	Lovell	LVLLMEXA	N
Northland Telephone of Maine, Inc.	Mattawmkeg	MTWMMEXA	N
Northland Telephone of Maine, Inc	North Lovell	NLVLMEXA	N
Northland Telephone of Maine, Inc.	Patten	PATNMEXA	N
Northland Telephone of Maine, Inc.	Palermo	PLRMMEXA	N
Northland Telephone of Maine, Inc.	Sherman Mill	SHMLMEXA	N
Northland Telephone of Maine, Inc.	Smyrna Mill	SMMLMEXA	N
Northland Telephone of Maine, Inc.	St. Francis	STFNMEXA	N
Northland Telephone of Maine, Inc.	Stockton Spring	STSPMEXA	N
Northland Telephone of Maine, Inc.	Washington	WASHMEXA	N

Exhibit E DECLARATION

DECLARATION UNDER PENALTY OF PERJURY

- I, Elizabeth L. Kohler, do hereby declare under penalty of perjury as follows:
- 1. I am the Vice President, Legal Services for Rural Cellular Corporation, the parent company of affiliates RCC Minnesota, Inc. and RCC Atlantic, Inc. (collectively, "Rural Cellular")
- 2. This Affidavit is submitted in support of Rural Cellular's Petition for Designation as an Eligible Telecommunications Carrier ("ETC").
- 3. Rural Cellular currently provides cellular service in the Personal Communications Service carrier in the Manchester-Nashua-Concord, NH Basic Trading Area, as the Cellular Radiotelephone Service ("CRS") provider in Portsmouth-Dover-Rochester, New Hampshire-Maine New England Cellular Market Area, and as the CRS provider in New Hampshire Rural Service Area 1 Coos, New Hampshire.
- 4. As a carrier not subject to state commission jurisdiction in the State of New Hampshire Rural Cellular is seeking designation as an ETC under Section 214(e)(6) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(6).
 - 5. Rural Cellular meets the criteria for ETC designation as explained herein.
- 6. Rural Cellular is a "common carrier" for purposes of obtaining ETC designation pursuant to 47 U.S.C. § 214(e)(1). A "common carrier" is generally defined in 47 U.S.C. § 153(10) as a person engaged as a common carrier on a for-hire basis in interstate communications by wire or radio. Section 20.9(a)7 of the Commission's Rules provide that cellular service is a common carrier service. See 47 C.F.R. § 20.9(a)(7).
- 7. Rural Cellular currently offers and is able to provide, within its designated service areas, the services and functionalities identified in 47 C.F.R. § 54.101(a). Each of these services and functionalities is discussed more fully below.
- a. <u>Voice-grade access to the public switched telephone network</u>. The FCC concluded that voice-grade access means the ability to make and receive phone calls, within a bandwidth of approximately 2700 Hz within the 300 to 3000 Hz frequency range. See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8810-11 (1997) ("Universal Service Order"). Rural Cellular meets this requirement by providing voice-grade access to the public switched telephone network. Through its interconnection arrangements with local telephone companies, all customers of Rural Cellular are able to make and receive calls on the public switched telephone network within the specified bandwidth.
- b. <u>Local Usage</u>. Beyond providing access to the public switched network, an ETC must include local usage as part of a universal service offering. To date, the FCC has not quantified a minimum amount of local usage required to be included in a

universal service offering, but has initiated a separate proceeding to address this issue. See Federal-State Joint Board on Universal Service, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 13 FCC Rcd 21252 (1998) ("October 1998 NPRM"). As it relates to local usage, the NPRM sought comments on a definition of the public service package that must be offered by all ETCs. Specifically, the FCC sought comments on how much, if any, local usage should be required to be provided to customers as part of a universal service offering. October 1998 NPRM, 13 FCC Rcd at 21277-21281. In the Universal Service Order, the FCC deferred a determination on the amount of local usage that a carrier would be required to provide. Universal Service Order, 12 FCC Rcd at 8813. Any minimum local usage requirement established by the FCC as a result of the October 1998 NPRM will be applicable to all designated ETCs, not simply wireless service providers. Rural Cellular will comply with any and all minimum local usage requirements adopted by the FCC. Rural Cellular will meet the local usage requirements by including local usage as part of a universal service offering.

- c. <u>Dual-tone</u>, <u>multi-frequency</u> ("DTMF") <u>signaling</u>, or its functional <u>equivalent</u>. DTMF is a method of signaling that facilitates the transportation of call setup and call detail information. Consistent with the principles of competitive and technological neutrality, the FCC permits carriers to provide signaling that is functionally equivalent to DTMF in satisfaction of this service requirement. 47 C.F.R. § 54.101(a)(3). Rural Cellular currently uses out-of-band digital signaling and in-band multi-frequency ("MF") signaling that is functionally equivalent to DTMF signaling. Rural Cellular therefore meets the requirement to provide DTMF signaling or its functional equivalent.
- d. <u>Single-party service or its functional equivalent</u>. "Single-party service" means that only one party will be served by a subscriber loop or access line in contrast to a multi-party line. *Universal Service Order*, 12 FCC Rcd at 8810. The FCC concluded that a wireless provider offers the equivalent of single-party service when it offers a dedicated message path for the length of a user's particular transmission. *Id.* Rural Cellular meets the requirement of single-party service by providing a dedicated message path for the length of all customer calls.
- e. Access to emergency services. The ability to reach a public emergency service provider by dialing 911 is a required service in any universal service offering. Enhanced 911 or E911, which includes the capability of providing both automatic numbering information ("ANI") and automatic location information ("ALI"), is only required if a public emergency service provider makes arrangements with the local provider for the delivery of such information. See id. at 8815-17. Rural Cellular currently provides all of its customers with access to emergency service by dialing 911 in satisfaction of this requirement. Rural Cellular will comply with all Phase II E-911 requirements.
- f. Access to operator services. Access to operator services is defined as any automatic or live assistance provided to a consumer to arrange for the billing or completion, or both, of a telephone call. *Id.* at 8817-18. Rural Cellular meets this

requirement by providing all of its customers with access to operator services provided by either the Company or other entities (e.g., LECs, IXCs, etc.)

- g. Access to interexchange service. A universal service provider must offer consumers access to interexchange service to make and receive toll or interexchange calls. Equal access, however, is not required. "The FCC do[es] not include equal access to interexchange service among the services supported by universal service mechanisms." Id. at 8819. Rural Cellular presently meets this requirement by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several IXCs. Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.
- h. Access to directory assistance. The ability to place a call to directory assistance is a required service offering. *Id.* at 8821. Rural Cellular meets this requirement by providing all of its customers with access to directory assistance by dialing "411" or "555-1212".
- i. Toll limitation for qualifying low-income consumers. An ETC must offer either "toll control" or "toll blocking" services to qualifying Lifeline customers at no charge. The FCC no longer requires an ETC to provide both services as part of the toll limitation service required under 47 C.F.R. § 54.101(a)(9). See Universal Service Fourth Order on Reconsideration, FCC 97-420 (Dec. 30, 1997). In particular, all ETCs must provide toll blocking, which allows customers to block the completion of outgoing toll calls. Universal Service Order, 12 FCC Rcd at 8821-22. Rural Cellular currently has no Lifeline customers in New Hampshire because only carriers designated as an ETC can participate in Lifeline. See 47 C.F.R. § 54.400-415. Once designated as an ETC, Rural Cellular will participate in Lifeline as required, and will provide its current toll blocking capabilities in satisfaction of the FCC's requirement. Today, the Company provides toll-blocking services for all international calls and toll blocking for selected customers. Accordingly, Rural Cellular currently has the technology to provide toll blocking and will use this technology to provide the service to its Lifeline customers, at no charge, as part of its universal service offerings.
- 8. Rural Cellular will provide the supported services using its existing network infrastructure, which includes the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the company to serve its existing conventional mobile cellular service customers.
- 9. I declare under penalty of perjury that the foregoing is true and correct. Executed

on March //, 2004.

Elizabeth L. Kohler, Vice President, Legal Services

Rural Cellular Corporation

Il for On

Exhibit F HIGH-COST CERTIFICATION LETTER



March 11, 2004

Federal Communications Commission 445 12th Street S.W. Washington, D.C. 20554

Re:

RCC Minnesota, Inc.

RCC Atlantic, Inc. High-Cost Certification

To the Commission:

RCC Minnesota, Inc. and RCC Atlantic, Inc. (collectively, "Rural Cellular" and/or "Company") has submitted a Petition for ETC designation in the State of New Hampshire as required by Sections 54.313(b) and 54.314(b) of the Federal Communications Commission's rules, 47 C.F.R. §§ 54.313(b), 54.313(b), Rural Cellular hereby submits the certification below in order to begin receiving high-cost support in its designated ETC area.

Accordingly, as Vice President, Legal Services of Rural Cellular, I hereby certify on behalf of the company and under penalty of perjury that all high-cost support provided to the Company will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, pursuant to Section 254(e) of the Telecommunications Act of 1996, 47 U.S.C. § 254(e). I also certify that I am authorized to make this certification on the company's behalf.

Elizabeth L. Kohler

Vice President, Legal Services

Date 3-11-04

SUBSCRIBED, SWORN AND ACKNOWLEDGED before me this // day of March, 2004.

NOTARY PUBLIC

My Commission Expires: <u>Jeb. 10, 2007</u>

Exhibit G ANTI-DRUG ABUSE CERTIFICATION

DECLARATION UNDER PENALTY OF PERJURY

I, Elizabeth L. Kohler, do hereby declare under penalty of perjury as follows:

- 1. I am the Vice President, Legal Services of Rural Cellular Corporation, parent of RCC Minnesota, Inc. and RCC Atlantic, Inc. (collectively, "Petitioner").
- 2. To the best of my knowledge, the Petitioner referred to in the foregoing Petition, including all officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non voting) of the applicant as specified in 1.2002(b) of the Commission's rules are not subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.
- 3. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March//, 2004

Elizabeth L. Kohler, Vice President, Legal Services

Rural Cellular Corporation